

# **EXHIBIT C**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, <i>et al.</i> ,	§	
	§	
Defendant-	§	
Intervenors.	§	

**DEFENDANT-INTERVENORS' AMENDED LIST OF LAY WITNESSES**

TO: Plaintiffs State of Texas, *et al.* by and through Todd L. Disher, Attorney in Charge, Special Counsel for Civil Litigation, P.O. Box 12548, Austin, TX 78711-2548, Todd.Disher@oag.texas.gov.

Defendant-Intervenors Karla Perez, Maria Rocha, Jose Magaña-Salgado, Nanci J. Palacios Godinez, Elly Marisol Estrada, Karina Ruiz De Diaz, Carlos Aguilar Gonzalez, Karla Lopez, Luis A. Rafael, Darwin Velasquez, Jin Park, Oscar Alvarez, Nancy Adossi, Denise Romero, Pratishtha Khanna, Jung Woo Kim, Angel Silva, Moses Kamau Chege, Hyo-Won Jeon, Elizabeth Diaz, Maria Diaz, and Blanca Gonzalez (collectively, "Defendant-Intervenors") serve this amended list of lay witnesses in accordance with the parties' June 6, 2018 letter agreement.

1. Karla Perez, c/o Nina Perales, MALDEF, 110 Broadway, Suite 300, San Antonio, TX, (210) 224-5476. Ms. Perez will testify regarding her experience as a DACA recipient, including her background, education and current employment.

2. Esther Jeon, c/o Nina Perales, MALDEF, 110 Broadway Suite 300, San Antonio, TX, (210) 224-5476. Ms. Jeon will testify regarding her experience as a DACA recipient, including her background, education and current employment.
3. Jose Magana-Salgado, c/o Nina Perales, MALDEF, 110 Broadway Suite 300, San Antonio, TX, (210) 224-5476. Mr. Magana-Salgado will testify regarding his experience as a DACA recipient, including his background, education and current employment.
4. Nancy Adossi, c/o Nina Perales, MALDEF, 110 Broadway Suite 300, San Antonio, TX, (210) 224-5476. Ms. Adossi will testify regarding her experience as a DACA recipient, including her background, education and current employment.
5. Donald Neufeld, c/o Nina Perales, MALDEF, 110 Broadway Suite 300, San Antonio, TX, (210) 224-5476. Defendant-Intervenors will rely on Mr. Neufeld's previous sworn statements regarding his experience as Associate Director for Service Center Operations for USCIS, including the evaluation, processing, and adjudication of DACA applications.
6. Sarah R. Saldaña, c/o Nina Perales, MALDEF, 110 Broadway Suite 300, San Antonio, TX, (210) 224-5476. Ms. Saldaña will testify regarding her experience as former Director of ICE, including the effect of DACA on allocation of resources and law enforcement practices.
7. Art Acevedo, c/o Nina Perales, MALDEF, 110 Broadway Suite 300, San Antonio, TX, (210) 224-5476. Mr. Acevedo will testify regarding his experience as Chief of the City of Houston Police Department and as former Chief of the City of Austin Police Department, including the effect of DACA on police practices.
8. Brian Manley, c/o Nina Perales, MALDEF, 110 Broadway Suite 300, San Antonio, TX, (210) 224-5476. Mr. Manley will testify regarding his experience as the interim Chief of the City of Austin Police Department, including the effect of DACA on police practices.

Dated: June 10, 2018

Respectfully submitted,

**MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales  
Nina Perales (Tex. Bar No. 24005046);  
(SD of Tex. Bar No. 21127)  
Attorney-in-Charge  
Celina Moreno (Tex. Bar No. 24074754)  
(SD of Tex. Bar No. 2867694)  
Jack Salmon (Tex. Bar No. 24068914)  
(SD of Texas Bar No. 1130532)

Alejandra Ávila (Tex. Bar No. 24089252)  
(SD of Tex. Bar No. 2677912)  
110 Broadway, Suite 300  
San Antonio, Texas 78205  
Phone: (210) 224-5476  
Facsimile: (210) 224-5382  
Email: nperales@maldef.org

**GARCÍA & GARCÍA,  
ATTORNEYS AT LAW P.L.L.C.**  
Carlos Moctezuma García  
(Tex. Bar No. 24065265)  
(SD of Tex. Bar No. 1081768)  
P.O. Box 4545  
McAllen, TX 78502  
Phone: (956) 630-3889  
Facsimile: (956) 630-3899  
Email: cgarcia@garciagarcialaw.com

Attorneys for Defendant-Intervenors

**CERTIFICATE OF SERVICE**

I hereby certify that, on June 10, 2018, I served a copy of this document by electronic mail to all counsel listed below:

Todd L. Disher  
Special Counsel for Civil Litigation  
P.O. Box 12548  
Austin, TX 78711-2548  
[Todd.Disher@oag.texas.gov](mailto:Todd.Disher@oag.texas.gov)

Jeffrey S. Robins  
U.S. Department of Justice, Civil Division  
Office of Immigration Litigation  
District Court Section  
P.O. Box 868  
Washington, D.C. 20044  
[Jeffrey.Robins@usdoj.gov](mailto:Jeffrey.Robins@usdoj.gov)

/s/ Celina Moreno  
Celina Moreno